



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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February 20, 2015

Via Electronic Mail Only

Ms. Anne Littlejohn
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
anne.littlejohn@waterboards.ca.gov

**SUBJECT: Proposed Basin Plan Amendment and Draft Staff Report (January 2015),
Removal of MUN Use Designation in Twelve Constructed and/or Modified Water Bodies in the
Sacramento River Basin, Comments by Central Valley Clean Water Association**

Dear Ms. Littlejohn:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to review and provide comments on the proposed amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan) to Remove the Municipal and Domestic Supply (MUN) Beneficial Use in Twelve Constructed and/or Modified Water Bodies in the Sacramento River Basin that receive treated Municipal Wastewater from the Cities of Biggs, Colusa, Live Oak, or Willows.

As you know, CVCWA is a nonprofit association of Publicly Owned Treatment Works (POTWs) located throughout the Central Valley whose primary mission is to represent wastewater agencies in regulatory matters while balancing environmental and economic interests. CVCWA's members have a deep commitment to the protection of beneficial uses in the waters of California, and are strongly committed to effectively implementing water quality

Ms. Anne Littlejohn

Re: CVCWA Comments on Proposed Basin Plan Amendment,
MUN De-designation

February 20, 2015

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controls to meet the goals of the federal Clean Water Act and California's Porter Cologne Water Quality Control Act.

CVCWA is supportive of the proposed Basin Plan amendment and associated Draft Staff Report dated January 2015. CVCWA appreciates the effort and diligence of Central Valley Regional Water Quality Control Board (Regional Board) staff in the development of this amendment in a stakeholder environment. CVCWA was an active participant in the NPDES permit hearings for these four small communities. CVCWA has also been an active participant in the stakeholder process and appreciates the priority that the Regional Board has given to this important Basin Planning activity.

We offer one specific clarifying comment on the Draft Staff report as follows:

Page 31, Section 6.1.3, Second paragraph, first sentence:

We suggest substituting the word "increases" for the word "changes", adding the word "individual" prior to the words "point source discharges", and adding the words "beyond those authorized in existing NPDES permits" after the word "future." These changes are suggested to provide greater clarity to the application of the antidegradation policy in future NPDES permits. Again, we appreciate the opportunity to review the proposed Basin Plan amendment and supporting documentation. If you have any questions, please contact me.

Sincerely,



Debbie Webster,
Executive Officer

cc (via email): Pamela Creedon, Central Valley Regional Water Quality Control Board
(pcreedon@waterboards.ca.gov)